State of Washington Department of Ecology
Notice of Construction Approval Order

In the matter of approving a new air contaminant source for Simplot US Food Group Holdings, LLC – Rainier Plant)))

Preliminary Determination
AQPID No. A0250324

Project Summary

Simplot US Food Group Holdings, LLC – Rainier Plant, herein referred to as the Permittee, is a new potato processing plant located at 2107 Road O NE, Moses Lake, Washington, in Grant County.

The Permittee will be classified as a Title V source for Volatile Organic Compounds, and Carbon Monoxide, after startup of the Rainier Plant due to the proximity of the existing Simplot Moses Lake facility, both operations will be considered one source and require an Air Operating Permit.

The project consists of installation and operation of a potato processing facility. The following table addresses all emission units evaluated for this project:

Emission Unit ID	Equipment and Air Pollution Control Equipment	Process Area
EU1	Boiler – Natural Gas or Biogas fueled, 99 MMBTU/hour, Cleaver Brooks – Nebraska or equivalent	Production
--	Line 1 – Peeling, Sorting, Grading, Blancher	Production
EU2	Line 1 – Dryer, boiler heated	Production
EU3	Line 1 – Batter and Fryer, boiler heated	Production
--	Line 1 – Pre-cool, Freeze Tunnel	Production
--	Line 2 – Peeling, Sorting, Grading, Blancher	Production
EU4	Line 2 – Dryer, boiler heated	Production
EU5	Line 2 – Former, Fryer, boiler heated	Production
--	Line 2 – Spiral Freezer	Production
--	Line 1 and 2 - Packaging	Production

Emission Unit ID	Equipment and Air Pollution Control Equipment	Process Area
EU6	Line 1 and 2 – Wet Electrostatic Precipitator (WESP) Particulate Matter Control for Fryers, A.H. Lundberg Systems or equivalent, 19,500 dscfm	Production
EU7	Anaerobic Digester, 20 million gallons, existing on adjacent parcel	Process water Treatment
EU8	Biogas Flare – John Zink ZTOF	Process water Treatment
EU9	Clarifier – Eimco/Clari-thickener	Process water Treatment
EU10	Biogas sulfur removal technology (98 percent removal) Iron Sponge, MV Technologies, H_2SPlus System or equivalent	Process water Treatment
EU11	Air Handling Units, total of 54.3 MMBTU/hour	Production
EU12	Air Handling Units, total of 0.93 MMBTU/hour	High Bay Freezer
--	Equipment Below Exempt from New Source Review	--
EU13	Diesel Fire Water Pump, 350 hp	Production
EU14	Diesel Emergency Generator, 237 hp, Kohler Model 150REOZJF	High Bay Freezer

Legal Authority

The emissions from the proposed project have been reviewed under the legal authority of RCW 70A.15.2210 and the applicable rules and regulations adopted thereunder. The proposed project, if operated as specified, will be in accordance with applicable rules and regulations, as set forth in Chapters 173-400 WAC and 173-460 WAC and the operation thereof, at the location proposed, will not result in ambient air quality standards being exceeded.

This Notice of Construction (NOC) Approval Order rescinds and replaces NOC Approval Order No. 23AQ-E016. NOC Approval Order No. 23AQ-E016 is no longer in effect.

Therefore, it is ordered that the project as described in the NOC application and more specifically detailed in plans, specifications, and other information submitted to the

Washington State Department of Ecology (Ecology) is approved for construction and operation, provided the following conditions are satisfied:

Approval Conditions

1. Facility-Wide Operation Limits

a. Total annual facility fuel consumption must not exceed 1,098 million cubic feet of natural gas.

b. Line 1 (Main Line) must be limited to production throughput of 1,452 thousand finished packed pounds per calendar day (thousand pounds (Klb)/day).

c. Line 2 (Form Line) must be limited to production throughput of 330 Klb/day finished packed pounds.

2. Line 1 Main Dryer

a. Emission Limits

i. Particulate Matter (PM): 0.91 pounds per hour, as determined by 40 C.F.R. Part 60, Appendix A, Test Methods 5 and 202.

ii. Volatile Organic Compounds (VOC): 0.53 pounds per hour, as determined by 40 C.F.R. Part 60, Appendix A, Test Method 25A.

iii. Visible emissions must be no more than ten percent opacity, averaged over a six-minute period, as determined by 40 C.F.R. Part 60, Appendix A, Test Method 9.

b. Testing Requirements

i. Initial testing of VOC, PM, and opacity to show compliance with emission limits on the Line 1 Dryer must be conducted within 180 days after startup. After initial testing, there will be no set frequency for additional performance testing.

ii. Operating parameters: during testing, the following dryer baseline operating parameters and characteristics must be recorded:

A. Dryer production rate (finished packed pounds) and type of product being dried.

3. Line 2 Form Dryer

a. Emission Limits

i. Particulate Matter (PM): 0.50 pounds per hour, as determined by 40 C.F.R. Part 60, Appendix A, Test Methods 5 and 202.

ii. Volatile Organic Compounds (VOC): 1.0 pounds per hour, as determined by 40 C.F.R. Part 60, Appendix A, Test Method 25A.

iii. Visible emissions must be no more than ten percent opacity, averaged over a six-minute period, as determined by 40 C.F.R. Part 60, Appendix A, Test Method 9.

b. Testing Requirements

i. Initial testing of VOC, PM, and opacity to show compliance with emission limits on the Line 2 Form Dryer must be conducted within 180 days after startup. After initial testing, there will be no set frequency for additional performance testing.

ii. Operating parameters: during testing, the following dryer baseline operating parameters and characteristics must be recorded:

A. Dryer production rate (finished packed pounds) and type of product being dried.

4. Air Handling Units

a. Air Handling Units for the Production Building and High Bay Freezer must be limited to a total of 55.23 MMBTU/hour.

5. Line 1 and Line 2 Fryers Wet Electrostatic Precipitator (WESP)

a. The permittee must maintain the WESP in good working order. Line 1 and Line 2 Fryer emissions must be exhausted to the WESP, whenever the Fryers are in operation.

b. Emission Limits and Test Methods

i. Initial testing for PM, VOC, and opacity to show compliance with emission limits, from the fryers' WESP must be conducted within 180 days after startup. After initial testing, PM, VOC, and opacity must be tested annually for two years. After three years, then performance testing for PM, VOC, and opacity must be conducted every five years.

ii. PM emissions in the WESP exhaust must not exceed 0.018 grains per dry standard cubic foot, 3.0 pounds per hour, as determined by 40 C.F.R. Part 60, Appendix A, Test Methods 5 and 202.

iii. VOC emissions in the WESP exhaust must not exceed 20 pounds per hour, as determined by 40 C.F.R. Part 60, Appendix A, Test Method 25A.

iv. The WESP must be operated such that the air flow does not exceed 19,500 dry standard cubic feet per minute (dscfm).

v. Alternative Testing – The testing requirements specified in Conditions 5.b.ii and 5.b.iii must be satisfied unless alternative or equivalent tests are requested in writing by the permittee and approved of by Ecology.

vi. Initial performance testing must be conducted between 90 to 110 percent of maximum permitted production rates. During follow up performance testing, the fryers must be operated at production rates of 90 to 110 percent of the maximum hourly production rate achieved during the preceding 12-month period.

vii. During testing, the following WESP operating parameters/characteristics must be recorded:

A. Total water flow and water pressure to the WESP.

B. Electrical power usage information from the control panel.

C. Hourly production rates (finished packed pounds) for both main line and formed line fryers.

6. Biogas Flare

a. Operational Requirements

i. The biogas flare is only approved to dispose of the gas produced by the 20 million gallon low-rate anaerobic digester. Any alterations that increase the digester organic loading capacity will require New Source Review of the biogas flare emissions.

ii. The flare must be operated with a flame present when digester gas is directed to the flare.

iii. Natural gas must be used to maintain the heat content of gas and vapors to the flare above 200 BTU per standard cubic feet.

iv. The pilot light to the flare and automatic ignition system must always be fully operable when the digester is operating, and digester gas is diverted to the flare.

v. The natural gas line to the pilot light must be equipped with an automatic shutoff valve that closes when the flare is not operating.

vi. The pilot light automatic ignition system must be inspected and tested at least once each 12-month period.

vii. The exhaust gases from the flare must discharge into the atmosphere vertically with no horizontal deflection by a rain cover.

viii. The permittee shall calibrate, maintain, and operate, in accordance with manufacturer specifications, a thermocouple or other equivalent device which

detects the presence of a flame at the flare. When a flame is not present, the following information must be recorded in a log:

A. The date(s) that the flame was not present.

B. The duration time the flame was not present.

C. The reason the flame was not present.

b. Stack Emission Limits and Associated Performance Testing

i. Visible emissions from the flare must not exceed zero percent opacity, except for a total of five minutes every two hours when it may be five percent opacity or less, as determined by 40 C.F.R. Part 60, Appendix A, Test Method 22.

7. Boiler

a. Production

i. Natural gas input to the boiler must not exceed 850 million cubic feet of natural gas per year (based on a heat content of 1,020 BTU/cubic feet Natural gas).

ii. Boiler heat input must be less than 99 million BTUs per hour.

b. Emission Limits

i. NOx emissions from the gas burner, for any fuel gas mixture, must not exceed 30 ppmvd, at three percent oxygen, 3.6 pounds per hour, as determined by 40 C.F.R. Part 60, Appendix A, Test Method 7E.

ii. CO emissions from the gas burner, for any fuel gas mixture, must not exceed 50 ppmvd at three percent oxygen, 4.0 pounds per hour, as determined by 40 C.F.R. Part 60, Appendix A, Test Method 10.

iii. PM emissions from the gas burner, for any fuel gas mixture, must not exceed 1.5 pounds per hour, as determined by 40 C.F.R. Part 60, Appendix A, Method 5 and Method 202.

iv. VOC emissions from the gas burner, for any fuel gas mixture, must not exceed 1.1 pounds per hour, as determined by 40 C.F.R. Part 60, Appendix A, Method 25A.

v. Sulfur dioxide (SO_2) emissions from the gas burner, for any fuel gas mixture, must not exceed 2.0 pounds per hour, as determined by 40 C.F.R. Part 60, Appendix A, Method 6.

vi. Opacity must be less than five percent, average over a six-minute time period, as determined by 40 C.F.R. Part 60, Appendix A, Test Method 9.

c. Boiler Testing Requirements

i. Initial source testing for NOx, CO, VOC, PM, SO_2, and opacity to show compliance with emission limits for the boiler must be conducted within 180 days after startup. After initial testing, NOx, and CO must be performance tested annually for two years. After three years, then testing for NOx and CO must be performance tested every five years.

A. Testing must be performed while combusting primarily natural gas with available digester gas from the anaerobic digester.

8. Digester Gas Testing Requirements

a. An H_2S removal technology capable of removing 98 percent sulfur from the biogas must be installed before biogas flows to the flare and the boiler.

b. Initial testing of digester gases for total sulfur content in the inlet and outlet of the H_2S removal technology must be conducted within 180 days after startup. After initial testing, the outlet of the H_2S removal technology must be performance tested annually for two years. After three years, performance testing must be conducted every five years.

c. During digester gas testing, the average wastewater flow to the digester and the average influent Chemical Oxygen Demand (COD) concentration must be monitored and recorded. Operation of the digester at a higher influent COD loading rate than that recorded during testing may be proposed but may result in additional digester gas total sulfur testing.

d. Testing of the digester gas must use the following pre-approved test methods or an Ecology approved equal:

i. Total Sulfur (H_2S) per 40 C.F.R. Part 60, Appendix A, Method 15.

9. Operation and Maintenance

a. The Permittee must follow all recommended installation, configuration, operation, and maintenance provisions supplied by emission unit and component manufacturers.

b. An operations and maintenance (O&M) manual must be developed by the Permittee for each emission unit. The manufacturer's instructions may be referenced in the O&M manuals.

i. The O&M manuals must include the following, at a minimum:

A. Normal operating parameters for emissions units.

B. A maintenance schedule for each emissions unit.

C. A description of the monitoring procedures.

D. Monitoring and record keeping requirements.

E. Actions to address abnormal control system operation.

ii. The O&M manuals must be developed within 30 days of commencing operation of each emission unit.

c. Emission units must be operated and maintained in accordance with the O&M manuals.

d. Reasonable precautions must be taken to prevent fugitive dust from becoming airborne, and the facility must follow a fugitive dust control plan (FDCP) to minimize emissions. The FDCP must be kept up to date and be available to Ecology for review upon request.

e. The Permittee must assess all air quality-related complaints received. The Permittee must evaluate the complaint and, for valid complaints, initiate corrective action in response to a valid air quality related complaint within three calendar days of receipt of the complaint.

10. Monitoring and Recordkeeping

a. The O&M manuals and any other relevant operating plan or FDCP must be reviewed annually.

i. The date of each review and the person performing each review must be documented in the O&M manual.

ii. The O&M manuals and FDCP must be updated to reflect any modifications to emission units or operating procedures.

b. O&M records must be kept on premises in hard copy or readily available on-site electronically.

c. For all air-quality related complaints, the following records must be kept:

i. A written record of the complaint received by the Permittee or forwarded to the Permittee.

ii. The Permittee's action to investigate the validity of the complaint, any corrective action that was taken in response to the complaint, and the effectiveness of the remedial action.

d. The date, time, duration, and cause of any periods where control technology equipment is out of service must be documented and maintained.

e. All data required by this NOC Approval Order must be maintained in a readily retrievable manner for a period of five years and must be made available to authorized representatives of Ecology upon request.

f. The Permittee must complete any additional monitoring or recordkeeping necessary to determine compliance with the requirements of this NOC Approval Order, as determined by Ecology.

g. Fuel consumption compiled monthly, on a rolling 12-month basis for the following equipment.

   i. The entire facility.

   ii. The Biogas Flare (in addition, the digester gas fired by this equipment must be recorded).

   iii. The Boiler (natural gas and digester gas consumption by this boiler must be recorded).

h. Production rate (finished packed pounds) and type of product for the following equipment:

   i. Main Line 1 Dryer.

   ii. Formed Line 2 Dryer.

i. Performance test reports for any performance testing required by Ecology or this Order. The biogas flare test data must include digester gas concentrations of sulfur in percent by weight.

j. Digester Gas Monitoring:

   i. Monthly average of daily digester influent COD concentration.

   ii. Monthly average wastewater flow to digester in million gallons per day.

11. Testing

a. Initial and recurring testing is required for the Line 1 and Line 2 Dryers, the boiler, the fryers' WESP, flare, and H_2S removal technology and retesting in the event of a failed test.

b. The Permittee must submit a test plan to Ecology for review and approval at least 30 days prior to source testing. Ecology may require a new protocol for re-test events conducted after a failed source test, when required, and Ecology may approve a shorter timeframe for submission for the re-test protocol. The test plan must include the following information, at a minimum:

   i. Identification of each emission unit to be tested.

   ii. The operating parameters to be monitored during the test.

   iii. A description of the emission units to be tested.

   iv. The time and date of the proposed source test.

   v. Identification and qualifications of the source test personnel.

vi. A description of the test methods and procedures to be used.

c. Test reports must be submitted to Ecology within 60 days of completion of the source testing. Test reports must include the following information, at a minimum:

i. The information described under Approval Conditions 2.c.ii, 5.b.vii, 7.c.i.A and 8.c.

ii. The information described in the test plan and any subsequent test plan approval letters.

iii. Field and analytical laboratory data.

iv. Quality assurance/quality control procedures and documentation.

v. Analyzer data recorded during the test.

vi. A summary of results, reported in units and averaging periods consistent with the applicable emission limit.

vii. A summary of control system and equipment operating conditions.

viii. Copies of all field data.

ix. Chain of custody information.

x. Calibration documentation.

xi. Discussion of any abnormalities associated with the results.

xii. A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

xiii. Emission calculations.

d. The Permittee must provide adequate sampling ports, safe sampling platforms, and access to platforms and utilities for sampling and testing, in accordance with 40 C.F.R. 60.8, 40 C.F.R. 63.7(d), and WAC 173-400-105(4).

e. Number of Test Runs – Unless otherwise specified, performance or compliance testing of each emission unit must consist of three separate runs of at least 60-minutes each.

f. Throughput during Testing – During testing, the process must be operated at a minimum of 90 percent of rated capacity for equipment with less than 12 months operating history, or 90 to 110 percent of the maximum process rate recorded during the preceding 12-month period for equipment operated for 12 months or more. Operation of the process during testing outside of the specified range may be proposed but may result in an operational restriction.

g. Notification of Inability to Conduct Performance Test – If the Permittee is unable to conduct any performance test as scheduled, Ecology must be notified at least 24 hours before the test at the address under Approval Condition 12, Reporting, or via telephone at (509) 329-3400.

h. When information obtained by Ecology indicates the need to quantify emissions, Ecology may require the Permittee to conduct material analysis or air emission testing under WAC 173-400-105. This testing requirement is in addition to any testing required by Ecology in this NOC Approval Order, other permits, or other state or federal requirements.

i. Alternate test methods and procedures may be proposed by the Permittee for Ecology review; a justification for the change must be included. Proposed alternates must not be utilized unless an approval is issued by Ecology, in writing, prior to the test.

12. Reporting

a. All notifications, plans, reports, and other submittals must be submitted in a manner approved by Ecology.

Washington State Department of Ecology
Air Quality Program
4601 N. Monroe Street
Spokane, WA 99205-1295

Reports may be submitted electronically to emissions.inventory@ecy.wa.gov

OR AS DIRECTED

b. The Permittee must submit semi-annual reports of Rainier facility emissions for Lines 1 and 2 to demonstrate compliance with emissions limits identified in this Approval Order. The reports must be submitted to Ecology every six months, by July 31, for the January through June reports and by January 31 for the July through December reports. These reports must include parameters used for calculating emissions. The report must include:

i. Production throughputs for Lines 1 and 2.

ii. Natural Gas usage for the facility, and Boiler.

iii. A certification of truth, accuracy, and completeness signed by a responsible official of the Permittee.

c. The Permittee must notify Ecology within one business day of receipt of any air quality-related complaint.

d. The Permittee must notify Ecology of commissioning of emission units within one week of initiating such activities, unless otherwise specified by Ecology. The notice must include available information:

i. Make, model, serial number, etc.

e. The Permittee must notify Ecology within thirty days of the following events:

i. Commencement of construction of the project.

ii. Completion of the construction of the project.

iii. If construction or operation has been discontinued for more than 18 months.

f. Greenhouse Gas Reporting: The permittee is subject to the greenhouse gas reporting requirements in WAC 173-441.

g. The Permittee must notify Ecology within sixty days (or longer as approved by Ecology) of the following events:

i. Changes in operation contrary to information submitted in the NOC application.

ii. Discontinued operations. This notification must include a shutdown status maintenance plan containing the following information, at a minimum:

A. Maintenance that will be performed during the shutdown to allow startup in a timely manner with minimum amount of work and emissions, (allowable emission levels as of the date of shutdown cannot increase upon reopening).

iii. Reactivating the facility following discontinued operations of 18 months or more. This notification must include a startup plan containing the following information, at a minimum:

A. Documentation that the shutdown maintenance was performed during shutdown to allow startup in a timely manner with minimum amount of work and emissions (allowable emissions levels as of the date of shutdown cannot increase upon reopening).

B. Documentation of testing performed which demonstrates that units are still able to meet the parameters of this approval order after being inactive, or other documentation which demonstrates why testing is not necessary.

13. General Conditions

a. **Activities Inconsistent with this Order** - Any activity undertaken by the Permittee, or others, in a manner that is inconsistent with the data and specifications submitted as part of the NOC application or this NOC Approval Order, must be subject to Ecology enforcement under applicable regulations.

b. **Availability of Order** - Legible copies of this NOC Approval Order and any O&M manual(s) must be available to employees in direct operation of the equipment described in the NOC application and must be available for review upon request by Ecology.

c. **Compliance Assurance Access** - Access to the source by representatives of Ecology or the United States Environmental Protection Agency (EPA) must be permitted upon request. Failure to allow access is grounds for enforcement action under the

federal Clean Air Act or the Washington State Clean Air Act and may result in revocation of this NOC Approval Order.

d. **Discontinuing Construction** – Approval to construct or modify a stationary source becomes invalid if construction is not commenced within eighteen months after receipt of the approval, or if construction is discontinued for a period of eighteen months or more. The permitting authority may extend the eighteen-month period upon a satisfactory showing by the permittee that an extension is justified.

e. **Equipment Operation** - Operation of the facility must be conducted in compliance with all data and specifications submitted as part of the NOC application and in accordance with O&M manuals, unless otherwise approved in writing by Ecology.

f. **Violation Duration** - If the Permittee violates an approval condition in this NOC Approval Order, testing, recordkeeping, monitoring, or credible evidence will be used to establish the starting date of the violation. The violation will be presumed to continue until testing, recordkeeping, monitoring, or other credible evidence indicates compliance. A violation of an approval condition includes, but is not limited to, failure of air pollution control equipment, failure of other equipment resulting in increased emissions, or a failed source test indicating an exceedance of an emission limit.

g. **Odor** - The Permittee must not cause or allow the generation of any odor which unreasonably interferes with any other property owner's use and enjoyment of their property. The Permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.

h. **Obligations Under Other Laws or Regulations** - Nothing in this NOC Approval Order must be construed so as to relieve the Permittee of its obligations under any state, local, or federal laws or regulations.

i. **Maintaining Compliance** - It must not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the operations in order to maintain compliance with the conditions of this NOC Approval Order.

j. **Visible Emissions** - No visible emissions from the source are allowed beyond the property line, as determined by 40 C.F.R. Part 60, Appendix A, Test Method 22.

k. **Changes in Operations** - Any changes in operation, discontinued operation or inadequate maintenance plans or restart plans (see “Reporting” requirements), may require a new or amended NOC Approval Order.

Authorization may be modified, suspended, or revoked in whole or part for cause, including, but not limited to, the following:

- Violation of any terms or conditions of this authorization.

- Obtaining this authorization by misrepresentation or failure to disclose full all relevant facts.

The provisions of this authorization are severable and, if any provision of this authorization or application of any provision to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this authorization, must not be affected thereby.

Your Right to Appeal

You have a right to appeal this Order to the Pollution Control Hearings Board (PCHB) within 30 days of the date of receipt. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in 43.21B.001(2) RCW.

To appeal you must do all of the following within 30 days of the date of receipt of this Order:

- File your appeal and a copy of this Order with the PCHB (see filing information below). "Filing" means actual receipt by the PCHB during regular business hours as defined in Chapter 371-08-305 WAC and -335. "Notice of appeal" is defined in Chapter 371-08-340 WAC.
- Serve a copy of your appeal and this Order on the Department of Ecology by mail, in person, or by email (see addresses below).

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

Address and Location Information

For the most current information regarding filing with the PCHB, visit: https//eluho.wa.gov/ or call: 360-664-9160.

Service on Ecology

Street Addresses:

Department of Ecology
Attn: Appeals Processing Desk
300 Desmond Drive SE
Lacey, WA 98503

Mailing Address:
Attn: Appeals Processing Desk
PO Box 47608
Olympia, WA 98504-7608

Email Address:

ecologyappeals@ecy.wa.gov

Americans with Disabilities Act Information

Accommodation Requests

To request ADA accommodation including materials in a format for the visually impaired, call Ecology at 360-407-7668 or visit https://ecology.wa.gov/accessibility. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.

Dated on this Day of June 2025.

Prepared by:

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Jenny Filipy, PE
Air Quality Program
Department of Ecology
State of Washington

Approved by:

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Air Quality Program
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